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February 29, 2024

VIA ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, for defendants. Defendants write to respectfully request a two week extension of time, from February 29, 2024 to March 14, 2024 for the parties to file their joint status letter regarding the status of the discovery of electronically stored information, namely text messages and e-mails. This is the first such request, which is made with Plaintiff's consent. This request is necessary in light of the undersigned being ill and out of the office. Defendants anticipate that this brief extension will enable the parties to make progress on this issue as discussed at the February 8, 2024 conference.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch
Senior Counsel

cc: **VIA ECF**

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Attorneys for Plaintiff